

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

MOHAMMADALI M. SHOJA,

Plaintiff,

v.

SECURITY FINANCE CORP OF  
SPARTANBURG,

Defendant.

3:18-cv-00369

**JOINT DISCOVERY/CASE MANAGEMENT PLAN**

Pursuant to the Honorable Court's Order (Dkt. #13), the Parties submit the following Joint Discovery/Case Management Plan and in support of state as follows:

1. Plaintiff intends to take the deposition of Robert Kelbe, Chief Information Officer for Defendant. Plaintiff may conduct an inspection of Defendant's call center. The parties propose that limited Discovery shall be completed on or before March 31, 2019.
2. After the completion of limited Discovery, Defendant intends to file a Dispositive Motion with regards to Count I of Plaintiff's Complaint. The parties propose the following briefing schedule:
  - a. Dispositive Motions filed on or before April 19, 2019;
  - b. Responses to Dispositive Motions filed on or before May 10, 2019;
  - c. Replies to Dispositive Motions filed on or before May 17, 2019.

Dated: January 17, 2019

s/ Nathan Volheim

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